

1 GEOFFREY A. HANSEN
Acting Federal Public Defender
2 JEROME E. MATTHEWS
Assistant Federal Public Defender
3 555 - 12th Street
Suite 650
4 Oakland, CA 94607-3627
Telephone: (510) 637-3500
5
Counsel for Defendant THOMAS CALISE
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR-11 00669 SBA
)	
12 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER CONTINUING STATUS
13 vs.)	CONFERENCE
)	
14 THOMAS CALISE,)	
)	
15 Defendant.)	
_____)	

16

17 This matter is set for a status conference on 10 April 2012. The indictment alleges
18 several counts of tax evasion and failure to file tax returns, dating as far back as 2003. To date
19 the government has produced over five thousand pages of discovery.
20

21 The defense has concluded its review of these documents and interviewed a number of
22 witnesses. The parties continue to jointly investigate and discuss the amount(s) of alleged tax
23 loss(es) for the years in question. The parties anticipate that they will be able to reach agreement
24 on the alleged tax loss amount and resolve this case short of trial.

25 In addition to the foregoing, defense counsel will be out of town during the entire week
26 of April 9, 2012.

For these reasons, IT IS STIPULATED AND AGREED that this matter be continued to April 24, 2012, and that time under the Speedy Trial Act be excluded until that date because the ends of justice outweigh the best interest of the public and the defendant in a speedy trial, for effective preparation of defense counsel, taking into account the exercise of due diligence, and for continuity of defense counsel. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). By that date, the parties expect to be able to report to the Court whether this matter will resolve or be set for motions and trial.

/S/

Dated: April 5, 2012

THOMAS M. NEWMAN
Assistant United States Attorney

/S/

Dated: April 5, 2012

JEROME E. MATTHEWS
Assistant Federal Public Defender

Good cause appearing therefor, IT IS ORDERED that this matter be continued until April 24, 2012, and that time under the Speedy Trial Act be excluded from April 10, 2012 until April 24, 2012 because the ends of justice outweigh the best interest of the public and the defendant in a speedy trial, for effective preparation of defense counsel, taking into account the exercise of due diligence, and for continuity of defense counsel. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

Dated: 4 / 6 / 12



SAUNDRA BROWN ARMSTRONG
United States District Judge